

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Revision of the Commission's Rules)	CC Docket No. 94-102
To Ensure Compatibility with)	RM-8143
Enhanced 911 Emergency Calling Systems)	
)	

**REPLY COMMENTS OF THE
TELECOMMUNICATIONS INDUSTRY ASSOCIATION**

The Telecommunications Industry Association (TIA), pursuant to Sections 1.415 and 1.419 of the Commission's Rules,¹ hereby comments in response to the Further Notice of Proposed Rulemaking (*FNPRM*) in the above-captioned proceeding.²

I. INTRODUCTION

TIA is the leading trade association representing the communications and information technology industry, with approximately 1,000 member companies that manufacture or supply the products and services used in global communications. Among their numerous lines of business, TIA member companies design, produce and deploy commercial wireless network and terminal equipment.

II. DISCUSSION

¹ See 47 C.F.R. §§ 1.415, 1.419.

TIA believes that a call back requirement for noninitialized handsets in circulation today would require a major network redesign, likely cost many millions of dollars in design efforts, take years of standards redefinition and design, and potentially result in a solution that would be extremely complex and may not be comprehensive, especially for current handsets.

TIA believes that it is not possible with current network and handset design to provide either permanent or temporary 911 call back numbers to noninitialized handsets. The consequences of a network redesign are so great that no proposed solution should be seriously considered without the Commission, in concert with interested parties, undertaking a very complete end-to-end (handset-to-PSAP) review of the scope and potential costs of the network redesign problem.

In any case, the original Commission mandate itself states that a callback number is not required and when provided it is recognized that the number provided may not be reliable due to issues such as cloning. For example, a phone which has been illegally cloned will be provided 911 service without validation. If a legitimate customer then calls 911 and requires call back service, the return call from the PSAP may call back the valid subscriber or the cloned phone depending on who responds to the page of the callback.

² Further Notice of Proposed Rulemaking, FCC 01-175 (released May 25, 2001) (*FNPRM*).

Numbering resources would be further strained by either a “permanent” or “temporary” number assignment to a noninitialized handset. A permanent number solution would put increasing quantities of numbers in network memory, likely exceed network memory capacity, speed telephone number exhaust, open the door to subscriber fraud, and likely require handset reprogramming. A temporary number solution would require the network to store a pool of dialable numbers, require a redesign of the network to check for temporary number need, aggravate number exhaustion, open the door to subscriber fraud, and likely require handset reprogramming.

TIA notes that the CTIA Call to Protect program does provide reprogrammed handsets to needy individuals. These handsets do have call back capability. The CTIA program fills some of the call back need, but does so using existing network design.

Since 1994, TIA subcommittee TR-45.2 and Committee T1P1, sponsored by the Alliance for Telecommunications Industry Solutions, have been developing technical solutions for Wireless E911. Some of this work was presented to the FCC by the Wireless E911 Implementation Ad Hoc Group (WEIAD) in a 1998 joint filing from CTIA, PCIA, APCO, NENA, NASNA, and the Ad Hoc Alliance for Public Access to 911. The accomplishments of TR-45.2 and T1P1 include:

- Publication of joint TIA/T1 standards J-STD-034 (E911 Phase I) and J-STD-036 (E911 Phase II).

- Working with public safety (specifically with public safety representatives present at most meetings).
- Efforts to achieve technical compliance with the FCC wireless enhanced 911 mandate (CC Docket No. 94-102).
- Consideration of public safety requirements beyond this mandate.

Examples of capabilities that go beyond the Commission's E911 mandate that are standardized in J-STD-034 or J-STD-036 are:

- E911 Reconnect, allowing automatic re-paging of a wireless phone that is disconnected due to a radio problem. This is different from callback, as it is done automatically by wireless systems and does not involve PSAP participation.
- Support for 911 calls established as a 3-way call following an inter-system handoff.
- Specification of Emergency Services Routing Key (ESRK) as a way to indirectly communicate information about a wireless call to a PSAP, as opposed to the Mobile Directory Number/ESRD method recommended in J-STD-034.
- Support for TCP/IP as a network interface, for the convenience of public safety, as opposed to SS7 which is the preferred interface for telecommunications signaling.
- An easily recognizable non-dialable "callback number," specific to the handset to allow harassment identification, is provided when a valid callback number cannot

be determined.

The Commission may not be aware of the significant technical work already done.

The Commission may wish to consider a system for the E911 mandate where technical work is performed by industry-wide, open technical committees (e.g. TIA TR-45.2 and ATIS T1P1), with the Commission exercising a regulatory/oversight role. If this direction was taken, the only change required would be for the recognized industry group(s) to report to the Commission on progress in areas such as E911 callback, with Commission intervention only if it becomes clear that the industry effort is inadequate, biased or needs to be given direction through new or modified rules or regulations.

III. CONCLUSION

TIA long has had a substantial interest in the 911 call back issues detailed in this filing and in other important public safety issues. TIA requests that the Commission take into consideration its views expressed above.

Respectfully submitted,

**TELECOMMUNICATIONS INDUSTRY
ASSOCIATION**

/s/

Grant E. Seiffert

Vice President, External Affairs and Global Policy

Derek Khlopin

Director, Law and Public Policy

Bill Belt

Director, Technical Regulatory Affairs

1300 Pennsylvania Ave., NW

Suite 350

Washington, DC 20004

202.383.1480

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